

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE: \* CASE NO. 24-04085-ESL  
\*  
JACQUELINE ANNE SINGH \* CHAPTER 7  
\*  
Debtor(s). \*  
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**EMERGENCY MOTION REQUESTING CONTINUANCE OF 341 MEETING  
AND REQUEST FOR OTHER RELIEF**

TO THE HONORABLE ENRIQUE S. LAMOUTTE, US BANKRUPTCY JUDGE:

NOW COME(S), debtor(s), through his(their) undersigned attorney(s) of record and respectfully state(s) as follows:

1. The continued 341 meeting is scheduled for October 31, 2024, at 3:45 PM.
2. Debtor has reason to believe that she's the victim of an organized harassment campaign that threatens the integrity of these proceedings and the Debtor's personal safety. Attached are 2 screenshots in support of her valid concerns.
3. Additionally, Debtor is named in a criminal prosecution indictment in the Middle District of Florida (Case No. 2024CF000113A, "STATE OF FLORIDA VS FILION, ALAN WINSTON") as the intended target of threats made by ALAN WINSTON FILION.
4. In that investigation, ALAN WINSTON FILION was indicted for multiple felonies and acts of terrorism, including false reports of weapons of mass destruction, unlawful use of communications

devices to further terrorism, and swatting-related offenses that targeted Debtor, including making threats to "hire a hitman to murder" Debtor.

5. The indictment specifically references evidence provided by Debtor, and the government's case for pretrial confinement explicitly includes Debtor's name.

6. Debtor has not yet provided testimony, and Debtor's safety remains at risk due to:

- i. The documented threats in the indictment
- ii. The connection between ALAN WINSTON FILION and DANIEL WILLIAM MULLEN
- iii. The ongoing harassment campaign
- iv. The coordination of multiple bad actors.

7. Since at least February 10, 2024, Debtor has been subjected to a coordinated interstate harassment campaign led by DANIEL WILLIAM MULLEN of Kingston, Massachusetts, including:

- i. Public dissemination of bankruptcy files and proceedings details
- ii. Orchestrated attempts to disrupt court proceedings
- iii. Financial harassment and interference
- iv. Verbal and written interstate threats to Debtor's parental rights and professional standing

8. Debtor has been actively pursuing law enforcement intervention regarding this harassment campaign:

- i. Debtor has an established relationship with the FBI Milwaukee Field Office in connection with their investigation of ALAN WINSTON FILION's criminal activities
- ii. On June 4, 2024, FBI Milwaukee acknowledged receipt of Debtor's complaints regarding DANIEL WILLIAM MULLEN's harassment campaign
- iii. FBI advised that due to resource constraints, they are focusing solely on violent crimes and swatting incidents

9. The limited scope of FBI resources has created a dangerous gap in protection:

- i. The harassment campaign continues unabated
- ii. Multiple jurisdictions are involved, complicating local enforcement
- iii. The bankruptcy proceedings now provide a new vector for coordinated harassment
- iv. Traditional law enforcement channels have been exhausted

10. Debtor seeks the following immediate relief:

- a. Restriction of public access to hearing.

- b. Prohibition of recording/broadcasting proceedings
  - c. Security screening of hearing participants.
  - d. Sealed status for sensitive filings and Debtor's physical home address.
  - e. Prohibition against harassment or interference with proceedings.
  - f. Referral to U.S. Attorney's Office for criminal investigation
11. Given law enforcement's resource limitations, this Court's intervention is particularly crucial:
- i. No other forum is currently positioned to provide immediate protection
  - ii. The imminent bankruptcy hearing creates urgent security concerns
  - iii. The interstate nature of the harassment campaign makes local enforcement challenging
  - iv. The organized nature of the harassment requires court-ordered protective measures
12. Immediate relief is necessary because:
- i. Upcoming 341 meeting is scheduled for October 31, 2024
  - ii. Demonstrated pattern of organized harassment.
  - iii. Public threats to disrupt proceedings.

iv. Risk to Debtor's safety and privacy.

v. Interference with federal criminal investigation.

WHEREFORE, debtor(s) through his(their) undersigned attorney(s) of record respectfully requests as follows:

- A. Grant this Emergency Motion and continue the rescheduled 341 meeting date.
- B. Enter proposed Protective Order
- C. Implement requested security measures
- D. Refer matter to U.S. Attorney
- E. Grant such other relief as appropriate

#### NOTICE

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

Respectfully submitted in Carolina, Puerto Rico, on October 29, 2024.

**CERTIFICATE OF SERVICE, P.R. LBR 9013-3**

I hereby certify that on this day, I electronically filed the foregoing with the Clerk of the Court uploading the same using the CM/ECF System which will send notification of such filing to all parties of record registered in the use of the CM/ECF system.

**FREDERIC CHARDON DUBOS LAW OFFICE**

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